

April 29, 2015

Federal Elections Commission,
Office of Complaints Examination
and Legal Administration,
999 E Street, NW,
Washington, DC
20436
Attn: Kim Collins, Paralegal
Email: kcollins@fec.gov

Re: MUR 6931

It has been brought to my attention that a donation made in April 2014 was counter to the guidelines and regulations of the Federal Election Campaign Act of 1971 due to the fact that I am a Canadian citizen and resident. I will offer my explanation of the events whereby I donated \$500 to the North Dakota Oil PAC and explain how I feel my intents were only genuine and not intended to violate any Federal laws or regulations whatsoever.

Personal identification is as follows:

Name: Dean Edward George Potter

Home address:

Calgary, Alberta

Canada T3H 3K2

Date of birth:

Profession and education: Petroleum Geologist; Bachelors of Science (Honors) in Geology; Master of Science in Geology; University of Regina, Regina, Saskatchewan

Professional area of expertise: USA and Canadian portions of the Williston Basin, which occupies all or portions of Saskatchewan, Manitoba, Montana and North and South Dakota (see attached map)

Professional Affiliations:

American Association of Petroleum Geologists (AAPG); 25 years plus membership

Canadian Society of Petroleum Geologists (CSPG; Calgary based)

Rocky Mountain Association of Geologists (RMAG; Denver based)

Association of Professional Engineers and Geoscientists of Saskatchewan (APEGS); hold P. Geol professional designation

Association of Professional Engineers and Geoscientists of Alberta (APEGA); hold P. Geol professional designation

Professional affiliation to area under investigation: author of numerous geological papers, core workshops and conference presentations over a 20-25 year period relevant to the geology of the Williston Basin, including both the Canadian and USA portions of the basin; have taken an active role in educating peers and geology students on the basin geology, possibly paying more attention to the US portion of the basin.

Awards: Saskatchewan Oilman of the Year (1990); awarded by industry peers for discovery and development of a significant oil discovery that was located in southern Saskatchewan portion of the Williston Basin, but achieved by gaining qualified experience mapping the geology across the border in Montana.

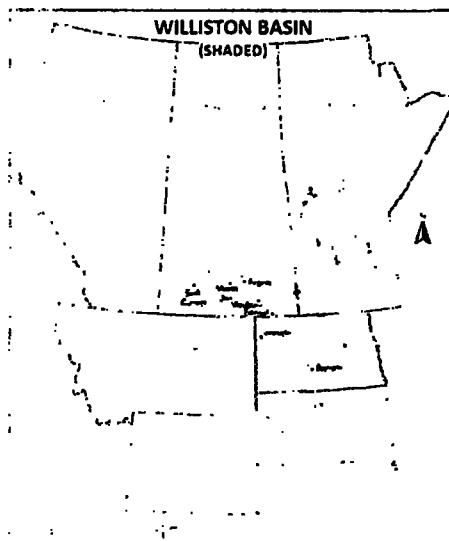
Petroleum geologist achievements: numerous USA and Canadian Williston Basin oil and gas discoveries, most often within 30 miles either side of the International Border. Extensive exploration and development experience in western Canada, other USA Rockies geological basins, South America and Abu Dhabi.

Business Affiliations:

Present: owner of two private companies based in Calgary; one with petroleum assets in both North Dakota and Saskatchewan (Alberta incorporation), the other with only North Dakota assets (Delaware incorporation). These assets were built personally by generating bona fide drilling prospects that were subsequently offered to larger oil and gas entities in return for gross overriding royalties. Also General Partner of a Delaware Limited Partnership (LP) developing non-operated oil resources in North Dakota.

2009-2014: Founder, President, and CEO of Elkhorn Resources Inc.; successful private oil and gas company that built significant shareholder value immediately north of the International border (North Dakota- Saskatchewan)

2005-2009: Founder, President and CEO of Medora Resources Inc.; successful private oil and gas company that built significant shareholder value in SE Saskatchewan.



Personal Explanation: MUR 6931

In March or April, 2014, Ryan Kopseng of the ND Oil PAC sent me an email soliciting a donation for the ND Oil PAC evening social event hosted semi-annually when the Williston Basin Petroleum Conference is hosted on the USA side of the basin. In 2014, the WBPC was hosted in the city of Bismarck, N Dakota. The WBPC has been hosted annually since 1992 on either side of the International border by the Saskatchewan and North Dakota provincial and state regulatory bodies. I have been an attendee throughout the twenty three history of the conference and have benefitted significantly from the geological and business exchange with friends and colleagues, both American and Canadian. I would most definitely stand out in the Williston Basin professional population as a geologist with diverse knowledge and experience of both the Canadian and American geology of the basin and have enjoyed the honor of being accepted for numerous conference presentations and session chairman nominations.

The email request for a contribution by Ryan Kopseng cannot be forwarded as I no longer have any access to the former Elkhorn email server. The request, at least to my understanding, was to host a social event and dinner with open invitation to all conference delegates on the second evening of the WBPC. This event is hosted longstanding by the committee and is certainly well attended by my professional colleagues on either side of the International border whom consider it a very significant and appreciated contribution to the conference. The event offers an excellent opportunity to meet new and old friends and colleagues. As a long term attendee of the ND Oil PAC invitational event offered to all conference delegates, I thought it was a fitting contribution to the conference and appreciation for past invitations and hospitality.

Let me make it clear that in Canada, I have no declared political persuasion, and certainly in the USA have no opinion that I would ever share with friends and colleagues on US political matters. In fact, I regularly correct non-USA tax payers that they have a right to their political opinion but for myself, until I am a US resident and tax payer, the politics of someone else's country is no business to me other than passive information and observation.

Following Ryan Kopseng's email request, I forwarded a corporate cheque (unsure of amount) to ND Oil PAC and soon after had the cheque returned with the explanation that the ND Oil PAC could not accept contributions from corporate entities. Still wanting to support my profession and the conference, I wrote a second cheque for \$500 US to ND Oil PAC from a personal bank account. I think the personal cheque was for less than offered corporately.

As a royalty owner with North Dakota production and revenue in two companies, plus a US Limited Partnership, faithful contributor of state severance taxes, and dutiful payer of North Dakota and Federal corporate taxes, I understand the valuable work done by the ND Oil PAC to improve the business for small oil and gas businesses. Recent legislation to reduce the state severance taxes is a prime example of how the ND Oil PAC and industry at large can have a direct impact on the royalty income in each of my corporate entities. Others may think that the discovery of Bakken oil resources in North Dakota could never warrant any request from industry to government for tax or bureaucratic relief. I however, have been active exploring in the states of North Dakota and Montana beginning in 1982 and remain very active today. I have seen the depths of industry despair and inactivity that affects professionals, oil companies and the tax base that far overpowers the positive growth we have seen since 2004. I am pleased that the industry is healthy today (apart from current price crash of crude oil) and hope to do whatever I can from the professional or business perspective to that end.

Never was there any intent to violate any rules, nor did anyone in ND Oil PAC explain this in advance of depositing the cheque. I would think that if there are rules to be followed, it would be incumbent upon the organization with state charter to understand their legal obligations to members and the general public. The organization made an error when a Co-chair requested funds from a non-resident; further, they did not exercise their legal responsibility to determine if their solicitation violated any Acts before taking the cheque to the bank. The ND Oil PAC did understand the regulations that it could not accept corporate donations; their knowledge of their legal responsibilities should have also included whether they could first solicit and second cash a donation from a non-resident. I see that there was a public declaration by a state Senator on knowledge from the North Dakota Secretary of State that it is legal for the ND Oil PAC to accept funds from a non-resident. A contradiction as such to what is presented as a violation of a federal Act makes it rather complicated and overwhelming from my side of the argument where I was only doing my professional duty to support an industry organization.

ND Oil PAC has claimed responsibility for the error in soliciting and cashing my cheque. ND Oil PAC has apologized for the stress and inconvenience caused by this matter that only was meant to show goodwill on my part. When first notified about the error on the part of ND Oil PAC, I instructed them to donate the funds to a worthy North Dakota charity. On April 22, 2015, the ND Oil PAC delivered a cheque to my residence made to Dean Potter and for \$500 US. In the attached letter, the ND Oil PAC does specify that the contribution was for 'sponsorship of our May 2014 social.'

I regret this matter has occurred as a consequence of me voluntarily offering professional goodwill to my profession and the industry as a whole. I cannot accept any responsibility for the error made by an organization with state charter and defined regulations and protocol. I hope I have adequately explained my professionalism and honesty and that you can remove my name as related to any violation of Federal charter and take up any matters further with ND Oil PAC.

Yours truly,



Dean Potter